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5 Attorney for Patrick Canet,  
6 Judicial Liquidator and  
6 Foreign Representative

7 **UNITED STATES BANKRUPTCY COURT**

8 **DISTRICT OF NEVADA**

9 IN RE:  
10 GHOLAM REZA JAZI ZANDIAN,  
11 Debtor in a Foreign Proceeding.

CASE NO. BK-N-16-50644-BTB  
CHAPTER 15

**DECLARATION OF JEFFREY  
HARTMAN IN OPPOSITION TO  
MOTION TO DISMISS**

12 **Hearing Date: October 1, 2019**  
13 **Hearing Time: 2:00 p.m.**

14 Jeffrey L. Hartman, under penalty of perjury of the laws of the United States,  
15 declares:

16 1. I am an attorney in good standing with the State Bar of Nevada and am admitted  
17 to practice in this Court. I have personal knowledge of the matters stated herein  
18 2. On June 23, 2016, the Court conducted a hearing on the Petition by Patrick Canet  
19 ("Liquidator Canet"), for recognition of a foreign proceeding ("Petition") pending in France,  
20 **DE 1**, against Gholam Reza Jazi Zandian ("Zandian").

21 3. The Petition was opposed by Jed Margolin ("Margolin Objection"). **DE 13**. The  
22 Court directed Liquidator Canet to provide additional information and set August 10, 2016  
23 for a continued hearing on the Petition. The continued hearing date was scheduled to be  
24 September 9, 2016.

25 4. On August 3, 2016, I filed a Status Report And Reply Re: French Proceeding  
26 Against Zandian. **DE 18 and 18-1**. The attachments to **DE 18**, identified Liquidator Canet  
27 as the liquidator in the French proceeding against Zandian.

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1       5. Following the filing of the Status Report and Reply, on September 7, 2016, I sent  
2 an e-mail to Margolin's counsel, Steve Abelman, with a draft Order Granting Petition For  
3 Recognition And Chapter 11 Relief. **Exhibit A.**

4       6. On September 13, 2016, Mr. Abelman sent me an e-mail in reply, advising that  
5 the draft form of Order was acceptable. **Exhibit B**. Through inadvertence on my part, the  
6 proposed Order did not get lodged and was never entered.

7 DATED: September 19, 2019.

/S/ Jeffrey L. Hartman  
Jeffrey L. Hartman, Esq.